

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA**

Daniel Hagopian,

Plaintiff,

v.

Citation Oil & Gas Corporation and
Brigade Energy Services, LLC,

Defendant.

CASE NO. 1:22-CV-00088

**Joint Stipulation for Fourth Amended
Scheduling and Discovery Plan**

¶1 The parties, by and through their counsel of record, submit this Joint Stipulation to Amend the Scheduling and Discovery Plan. The parties propose the following stipulated amendments to the Scheduling and Discovery Plan:

1. The parties shall have until **March 2, 2026** to complete fact discovery and to file discovery motions.

2. The parties shall provide the names of expert witnesses and complete reports under Rule 26(a)(2) as follows:

a. **Plaintiff: March 9, 2026**

b. **Defendants: April 9, 2026**

c. **Rebuttal Experts: May 8, 2026**

(Treating physicians need not prepare reports, only qualifications, unless they will express opinions not reflected in the medical records).

3. The parties shall have until **May 22, 2026**, to complete discovery depositions of expert witnesses.

4. The parties shall have until **April 2, 2026**, to file all non-dispositive motions, not including motions in limine.

5. The parties shall have until **June 1, 2026**, to file other dispositive motions.

6. Each party shall serve no more than **50** interrogatories, including subparts, on any other party. (The case is fact intensive.)

7. Each side shall take no more than **20** discovery depositions.

8. Depositions taken for presentation at trial shall be completed **15** days before trial.

9. Counsel have discussed between themselves and explored with their clients early involvement in alternative dispute resolution. The following option(s) would be appropriate in this case.

 Arbitration

 X **Mediation** (choose one):

 X private mediator

 X court-hosted early settlement conference

10. The parties agree that the settlement conference should be held before a judge who will not be the trial judge.

11. The parties shall be ready to evaluate the case for settlement purposes by **February 9, 2026**.

12. A mid-discovery status conference **would** be helpful in this case.

13. The parties **will not** voluntarily waive their rights to proceed before a district judge and consent to have a magistrate judge conduct any and all further proceedings in the case, including the trial, and order the entry of a final judgment.

14. Trial of this case will be **jury**.

15. Trial has been rescheduled for **December 7 – 18, 2026**.

Dated this 12th day of June 2025.

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ATTORNEYS FOR CITATION
OIL & GAS CORPORATION

ORDER

The court **ADOPTS** the Parties' Fourth Amended Scheduling and Discovery Plan without any additions or modifications.

IT IS SO ORDERED.

Dated this 13th day of June, 2025.

/s/ Clare R. Hochhalter
Clare R. Hochhalter, Magistrate Judge
United States District Court